United States Environmental Protection Agency
Region V
POLLUTION REPORT

Date: Monday, July 12, 2010
From: Sam Borries, OSC

To: Michael Chezik, U.S. DOI
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Subject: Plainwell No. 2 Dam
Plainwell, MI
Latitude: 42.4279865
Longitude: -85.6292009

POLREP No.:	4	**Site #:**	059B
Reporting Period:	1/9/10 - 6/4/10	**D.O. #:**	
Start Date:	8/5/2009	**Response Authority:**	CERCLA
Mob Date:	8/5/2009	**Response Type:**	Time-Critical
Demob Date:		**NPL Status:**	NPL
Completion Date:		**Incident Category:**	Removal Action
CERCLIS ID #:		**Contract #**	
RCRIS ID #:			

Site Description

Former industrial and waste water treatment practices, that took place from approximately the 1950s to the mid-1970s, released polychlorinated biphenyls (PCBs) into the Kalamazoo River in southwest Michigan. At least one source of the PCBs was the waste water released from the paper mills operating in the Kalamazoo, Michigan area; specifically, from the processing and de-inking of carbonless copy paper containing PCBs. These paper mills released PCBs into the Kalamazoo River system, some of which deposited in the area of the river known as the Plainwell Impoundment (which was created as a result of the building of a hydroelectric dam on the Kalamazoo River in the early 1900s).

Beginning in 2007 and continuing through 2008, investigations in Area 1 of the Kalamazoo River OU, including Plainwell Dam #2, were conducted as part of the Supplemental Remedial Investigation/Feasibility Study (SRI/FS). Phase 1 of that work involved the delineation of frequently inundated areas of the floodplain upstream of Plainwell Dam #2. Phase 2 of the investigation involved the sampling of Plainwell Dam #2. Results of the Phase 2 investigation of Plainwell Dam #2 found elevated levels of PCBs in bank and floodplain soils and, to a limited extent, in in-stream river plain soil. Samples were collected at 94 locations from a uniform grid in the floodplain, including in-stream islands. A total of 302 individual samples were collected from the floodplain, with total PCB concentrations ranging from non-detect to 60 milligrams per kilogram (mg/kg). Bank soil samples were

collected from 78 locations. A total of 265 samples were analyzed for PCBs, with total PCB concentrations ranging from non-detect to 45 mg/kg. River plain soil samples were collected from 60 locations, resulting in 267 samples analyzed for PCBs. PCB concentrations in the river plain soil ranged from non-detect to 100 mg/kg. A summary of the investigation results is presented in the Plainwell No. 2 Conceptual Design Report.

On December 10 and 11, 2008, MDEQ collected 30 river plain soil cores and 18 bank cores. A total of 50 individual river plain soil and 25 soil samples were analyzed for PCBs. Total PCB concentrations in the river plain soil ranged from non-detect to 80.2 mg/kg. Total PCB concentrations in soil ranged from non-detect to 80.5 mg/kg.

The Allied Paper Inc./Portage Creek/Kalamazoo River Superfund Site (Site) encompasses the Kalamazoo River from Morrow Dam to Lake Michigan and approximately 3 miles of Portage Creek to the Kalamazoo River. The Plainwell Dam #2 (Site) is located approximately 3.5 miles upstream of the former Plainwell Dam in the Township of Gun Plain, T 1N, R 11 W, in portions of Sections 32 and 33 upstream to the Penn Central Railroad Bridge.

On June 8, 2009, an Administrative Order on Consent (AOC) was entered into between U.S. EPA and Georgia-Pacific, LLC, whereby, Georgia-Pacific agreed to conduct a time-critical removal action at the Site. The response actions include dredging and/or excavation of river plain soil, riverbank soils and floodplain soil, containment, monitoring, water treatment, stabilization and off-Site disposal of excavated material in accordance with federal PCB regulations at 40 C.F.R. § 761.61. The response activities will require approximately 200 on-Site working days to complete, and will result in the removal of approximately 12,000 cubic yards of waste material, containing approximately 89% of the PCBs in the Plainwell Dam #2.

Additional site description and history can be found in the July 2009 Plainwell No. 2 Dam Area Time-Critical Removal Action Design Report, the June 8, 2009, Administrative Settlement Agreement and Order on Consent for Removal Action, the June 8, 2009, Time-Critical Removal Action Memorandum, and other Administrative Record documents.

Current Activities

From January 9 to June 4, 2010, Arcadis and subcontractors obtained signed access agreements for work planned during the summer and fall of 2010; performed clearing and grubbing of work zones, staging areas, and river access roads on the west side of the Kalamazoo River; completed deconstruction of Staging Area 3 and access roads the on the east side of the Kalamazoo River; completed construction of soil hauling and river access roads from Staging Area 2 to the Kalamazoo River, and to Staging Area 1; completed the construction of Staging areas 2 and 3 (site trailers and parking zones); developed a temporary bridge to access Island 2; performed clearing and grubbing on Island 2; completed construction of the soil treatment area (Staging Area 1); and installed resuspension controls for Island 2. JF New completed restoration and reseeding of Staging Area 3; Staging Area 3 river access roads; and river bank Removal Areas 1, 3A, 4A, and 5A

On May 7th 2010, U.S. EPA OSC Sam Borries met with representatives from Georgia

Pacific, Arcadis, Terra, Michigan Department of Natural Resources and the Environment (MDNRE), and WESTON START to discuss expectations and plans for the summer and fall 2010 work.

Planned Removal Actions
See Pollution Report #1.

Next Steps
(1) Begin excavation at Island 2 on June 7, 2010.
(2) Begin implementation of confirmation sampling protocol as excavations proceed.

Key Issues
The progress of excavation activity is based on weather conditions.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
TAT/START	$100,081.19	$53,558.00	$100,081.19	46.49%
Intramural Costs				
Total Site Costs	$100,081.00	$53,558.00	$46,523.00	46.49%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.